UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

PEDRO RODRIGUEZ and LISETTE RODRIGUEZ

Plaintiff(s)

Case No. 09-5020 (RBK/AMD)

V.

CAMDEN CITY POLICE DEPARTMENT, CITY OF CAMDEN, OFFICER TYRONE MCEADY

Defendants

NOTICE OF MOTION FOR SUMMARY JUDGMENT

To: Clerk of the United States District Court Mitchell H. Cohen Federal Building and U.S. Courthouse – 1 John F. Gerry Plaza Camden, New Jersey 08101

> Robert B. Kugler, U.S.D.C.J. Mitchell H. Cohen Federal Building and U.S. Courthouse – 1 John F. Gerry Plaza Camden, New Jersey 08101

Matthew Weisberg, Esquire 7 South Morton Avenue Morton, PA 19070 Attorney For Plaintiffs

Mark M. Cieslewicz, Esquire Office of the City Attorney P.O. Box 95120 Camden, New Jersey 08101-5120

Please take notice that on the 4th day of April, 2011, or on a date and time to be set by the court, the undersigned attorney on behalf of Defendant Tyrone McEady, shall move before the Honorable Robert B. Kugler, U.S.D.C.J., Mitchell H. Cohen Federal Building and U.S. Courthouse – 1 John F. Gerry Plaza, Camden, New Jersey 08101, for an order granting Defendant McEady's motion for summary judgment.

Dated: March 18, 2011 Respectfully submitted by:

/s/ Ralph R. Kramer, Esquire
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